

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ROBERT DAVID STEELE *et al.*,

Plaintiffs,

v.

Civil Action No. 3:17cv601

JASON GOODMAN *et al.*,

Defendants.

**DEFENDANT PATRICIA A. NEGRON'S
MOTION TO APPEAR BY TELEPHONE AT SETTLEMENT CONFERENCE**

Defendant Patricia A. Negron (“Ms. Negron” or “Defendant”), by counsel, for her Motion to Appear at Settlement Conference by Telephone (“Motion”), relies upon the arguments¹ and authorities set forth in the accompanying memorandum filed herewith.

WHEREFORE, Defendant Patricia A. Negron, by counsel, respectfully requests the Court enter an Order: (1) granting her Motion permitting her to appear at the March 16, 2020 Settlement Conference by telephone; and (3) awarding such further and other relief as this Court deems appropriate.

¹ The Plaintiffs and Mr. Goodman oppose this Motion.

Dated: February 26, 2020

Respectfully submitted,

PATRICIA A. NEGRON

By: /s/Terry C. Frank
Terry C. Frank, Esq. (VSB No. 74890)
E-mail: tcfrank@kaufcan.com
KAUFMAN & CANOLES, P.C.
1021 E. Cary Street, Suite 1400
Richmond, Virginia 23219
Phone: (804) 771-5700
Fax: (888) 360-9092
Counsel for Defendant Patricia A. Negron

CERTIFICATE OF SERVICE

I hereby certify that on this 26th of February 2020, a true copy of the foregoing is being electronically filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Steven S. Biss (VSB No. 32972)
E-mail: stevenbiss@earthlink.net
300 West Main Street, Suite 102
Charlottesville, Virginia 22903
Phone: (804) 501-8272
Fax: (202) 318-4098
Counsel for Plaintiffs

And sent via first-class mail, postage prepaid, to:

Jason Goodman, Pro Se
252 7th Avenue, Apt. 6S
New York, NY 10001
truth@crowdsourcethetruth.com

“Queen Tut”
a/k/a Susan A. Lutzke
1221 University Ave., Unit D202
Fort Collins, CO 80521

/s/ Terry C. Frank
Terry C. Frank, Esq. (VSB No. 74890)
E-mail: tcfrank@kaufcan.com
Kaufman & Canoles, P.C.
1021 E. Cary Street, 14th Floor
Richmond, Virginia 23219
Phone: (804) 771-5700
Fax: (888) 360-9092
Counsel for Defendant Patricia A. Negron